

Remarks

This Amendment is responsive to the Office Action of October 19, 2004. Reexamination and reconsideration of **claims 1-22** is respectfully requested.

Summary of The Office Action

Claims 1-3, 5, 7-19, and 21-22 were rejected under 35 U.S.C. § 102(b) as being anticipated by Miyamoto et al. (U.S. Pat. No. 4,591,884).

Claims 4, 6, and 20 were rejected to as being dependent upon a rejected base claims 1 and 18 respectively, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

The Present Claims Patentably Distinguish Over the References of Record

Independent Claim 1

Claim 1 has been amended to clarify that the first accessory device is externally coupled to the printer and configured to receive printed pages from the printer. For example, Figure 3 of the present application illustrates an example accessory device 154 coupled to a printer 152. The accessory device 154 is external to the printer 152. Thus, no new matter has been added.

The Office Action rejected claim 1 under 35 U.S.C. § 102(b) as being anticipated by Miyamoto et al. (U.S. Pat. No. 4,591,884) and referred to the first paper handling portion 420 of Figure 16 as teaching the claimed first accessory device. It is clear from Figures 9, 16, and others that the first paper handling portion 420 is not external to the printer taught by Miyamoto but is an internal component. Thus, Miyamoto fails to teach or suggest an external accessory coupled to a printer as recited in present claim 1.

Since claim 1 recites features not taught or suggested by Miyamoto, claim 1 patentably distinguishes over Miyamoto. Accordingly, dependent claims 2, 3, and 5-12 also patentably distinguish over the references and are in condition for allowance.

Independent Claim 4

Dependent claim 4, which was indicated to contain allowable subject matter, has been rewritten in independent form. Claim 4 should now be in condition for allowance.

Independent Claim 13

Independent claim 13 is directed to an accessory device and has been amended to clarify that the accessory device is configured to be removably coupled to the previous device and is external to the previous device. Figure 3 shows one embodiment of an accessory device (e.g. device 154 or 156) that is external to each other and to the printer 152. The specification on pages 8 and 14, for example, describe that an accessory device can be coupled to other devices to form a chain. Thus, the accessory device can be removably coupled to other devices. No new matter has been added.

As previously explained, Miyamoto fails to teach or suggest the claimed accessory device that is external to another device. The printing components taught by Miyamoto that include a reversing paper path and/or a straight-through paper path are internal to the printer. Furthermore, there is no discussion or suggestion in Miyamoto that these components can be removably coupled as recited in claim 13. One of ordinary skill in the art would understand that paper handling portion 420 and 420' are internally fixed components within the printer and are not removable accessories.

Since claim 13 recites features not taught or suggested by Miyamoto, claim 13 patentably distinguishes over Miyamoto. Accordingly, dependent claims 14-17 also patentably distinguish over the references and are in condition for allowance.

Additionally, dependent claim 17 has been amended to recite that the accessory device is configured to be coupled externally to a printing device and be configured as part of a chain of accessory devices that can be coupled together. This is described, for example, on pages 8, 14, and Figure 3 of the present application. Thus, no new matter has been added. Miyamoto fails to teach or suggest any such accessory since the printer components are internal to the printer. For this addition reason, claim 7 patentably distinguishes over Miyamoto.

Independent Claim 18

Claim 18 has been amended to clarify that the first accessory device is externally coupled to the printing device. As such, the claimed "processing" involves a straight-through paper path and a reversing paper path in the first accessory device.

Miyamoto only teaches paper paths that are internal to the printer. Thus, the printer processes paper through these paths internally, and not with an externally coupled accessory device as recited in claim 18. Therefore, Miyamoto fails to teach or suggest the claimed features of claim 18 and claim 18 patentably distinguishes over Miyamoto. Accordingly, dependent claims 19-22 also patentably distinguish over the references and are in condition for allowance.

Conclusion

For the reasons set forth above, **claims 1-22** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

Respectfully submitted,



11-JAN-05

PETAR KRAGULJAC (Reg. No. 38,520)

(216) 348-5843